

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Emergent Fidelity Technologies Ltd,

Debtor.¹

)

) Chapter 11

)

) Case No. 23-10149 (JTD)

)

)

)

**NOTICE OF THE AMENDED LIST OF CREDITORS
WHO HAVE THE 20 LARGEST UNSECURED CLAIMS AND ARE NOT INSIDERS**

PLEASE TAKE NOTICE that on February 3, 2023 (the “Petition Date”), Emergent Fidelity Technologies Ltd (the “Debtor”), as debtor and debtor-in-possession under the control of Angela Barkhouse and Toni Shukla as the Joint Provisional Liquidators pursuant to the Appointment Order² of the Eastern Caribbean Supreme Court, High Court of Justice, Antigua and Barbuda, dated December 5, 2022, filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that on the Petition Date, the Debtor filed the Official Form 204—List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders (the “Top 20 List”) [D.I. 1].

PLEASE TAKE FURTHER NOTICE that the Debtor hereby files the Amended Top 20 List to update the contact information of unsecured creditors listed in the original Top 20 List. The Amended Top 20 List attached hereto as **Exhibit A** supersedes and replaces the originally filed Top 20 List.

¹ The Debtor in this Chapter 11 case is Emergent Fidelity Technologies Ltd, a company formed under the laws of Antigua and Barbuda with registration number 17532 as identified by the Antigua and Barbuda Financial Services Regulatory Commission. The Debtor’s principal place of business is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² The Appointment Order is attached as **Exhibit B** to the *Declaration of Angela Barkhouse in Support of the Debtor’s Chapter 11 Petition* [D.I. 3].

PLEASE TAKE FURTHER NOTICE that the Official Form 202 attesting to the accuracy of the Amended Top 20 List is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that the Debtor reserves its rights to further amend or supplement the Amended Top 20 List. Nothing contained in this Notice shall preclude the Debtor from objecting to any claim, whether scheduled or filed, on any and all grounds.

Dated: March 9, 2023
Wilmington, DE

MORGAN, LEWIS & BOCKIUS LLP

/s/ Jody C. Barillare

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*Proposed Counsel for Emergent Fidelity
Technologies Ltd as Debtor and Debtor-in-
Possession*

EXHIBIT A

Amended Top 20 List

Fill in this information to identify the case:Debtor name Emergent Fidelity Technologies LtdUnited States Bankruptcy Court for the: _____ District of Delaware
(State)

Case number (If known): _____

☒ Check if this is an amended filing**Official Form 204****Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders****12/15**

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	BlockFi Inc. 201 Montgomery Street, Suite 263 Jersey City, NJ 07302	Haynes and Boone LLP Attn: Richard S. Kanowitz +1 212 659 7300 richard.kanowitz@haynesboone.com	Alleged secured claim that is the subject of an adversary proceeding in the New Jersey Bankruptcy Court and also subject to potential avoidance	Contingent, Unliquidated, and Disputed	\$660,000,000.00*	\$650,864,260.27**	\$9,135,739.73*
2	BlockFi Lending LLC 201 Montgomery Street, Suite 263 Jersey City, NJ 07302	Haynes and Boone LLP Attn: Richard S. Kanowitz +1 212 659 7300 richard.kanowitz@haynesboone.com	Alleged secured claim that is the subject of an adversary proceeding in the New Jersey Bankruptcy Court and also subject to potential avoidance	Contingent, Unliquidated, and Disputed	\$660,000,000.00*	\$650,864,260.27**	\$9,135,739.73*
3	BlockFi International LLC 201 Montgomery Street, Suite 263 Jersey City, NJ 07302	Haynes and Boone LLP Attn: Richard S. Kanowitz +1 212 659 7300 richard.kanowitz@haynesboone.com	Alleged secured claim that is the subject of an adversary proceeding in the New Jersey Bankruptcy Court and also subject to potential avoidance	Contingent, Unliquidated, and Disputed	\$660,000,000.00*	\$650,864,260.27**	\$9,135,739.73*
4	Hazoor Digital Assets Fund, LP 9390 Research Blvd, Bldg. 2, Suite 110 Austin, TX 78759	Darsh Singh +1 317 514 9414 darsh@hazoorpartners.com	Potential litigation claim	Contingent, Unliquidated, and Disputed			\$3,355,145.96
5	Yonatan Ben Shimon c/o Forbes Hare Qwomar Building, 4th Floor Blackburn Highway Road Town, Tortola VG1110 British Virgin Islands	William Hare +1 284 852 1890 william.hare@forbeshare.com	Litigation claim subject to Antigua proceedings	Contingent, Unliquidated, and Disputed			\$3,500,000.00
6							
7							
8							

* This reflects the aggregate amount of the claims of the BlockFi entities on this list and has not been allocated among the individual BlockFi entities. The Debtor disputes such claims in all respects.

** The value of the property that the BlockFi entities allege constitutes collateral securing their claims, as determined on an aggregate basis, is approximately \$650,864,260.27 as of February 3, 2023. The Debtor disputes the secured status of the claims in all respects, including, without limitation, the validity, scope, and perfection of the liens on or security interests in the property.

Debtor Emergent Fidelity Technologies Ltd Case number (if known) _____

Name

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9							
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** The value of the property that the BlockFi entities allege constitutes collateral securing their claims, as determined on an aggregate basis, is approximately \$650,864,260.27 as of February 3, 2023. The Debtor disputes the secured status of the claims in all respects, including, without limitation, the validity, scope, and perfection of the liens on or security interests in the property.

EXHIBIT B

Official Form 202

Fill in this information to identify the case and this filing:

Debtor Name Emergent Fidelity Technologies Ltd

United States Bankruptcy Court for the: _____ District of Delaware
(State)

Case number (If known): 23-10149 (JTD)

Official Form 202**Declaration Under Penalty of Perjury for Non-Individual Debtors****12/15**

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☒ Amended Schedule Official Form 206Sum, Amended Schedule A/B, and Amended Schedule E/F
- ☐ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☒ Other document that requires a declaration Amended Official Form 204

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 03/08/2023
MM / DD / YYYY

x 

Signature of individual signing on behalf of debtor

Angela Barkhouse
Printed name

Joint Provisional Liquidator of Emergent Fidelity Technologies Ltd
Position or relationship to debtor